

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)

V.)

CARLOS SALVATE)

CRIMINAL NO. 05-30026-MAP

MOTION TO CONTINUE

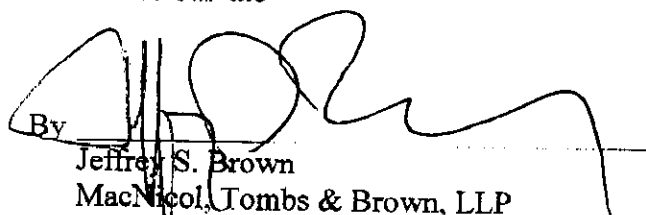
NOW COMES the defendant, Carlos Salvate, by and through counsel, and moves this Honorable Court to continue the change of plea hearing scheduled for April 5, 2006.

As reason therefore, defense counsel states that he has been called to trial at 9:00 am on April 5, 2005 before the Hampden County Superior Court (Rup, J.) in the matter of Commonwealth v. Timothy Welsh, Hampden County Indictment No. 04 109. Mr. Welsh's case was scheduled for trial on March 9, 2006 and has been held in line awaiting an available trial session since that date. The trial is expected to last one to two days.

DATED: April 5, 2006

The defendant,

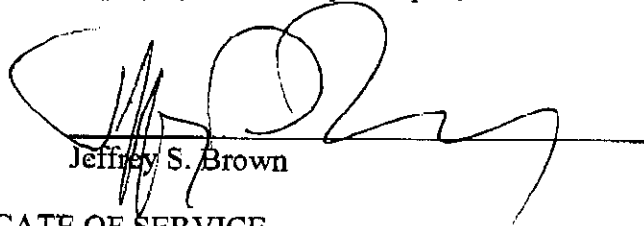
Carlos Salvate

By 
Jeffrey S. Brown
MacNicol, Tombs & Brown, LLP
393 Main Street, P.O. Box 985
Greenfield, MA 01302
413-772-8600
BBO# 558787

AFFIDAVIT OF JEFFREY S. BROWN

I, Jeffrey S. Brown, hereby swear and affirm that the information contained in the foregoing motion is true.

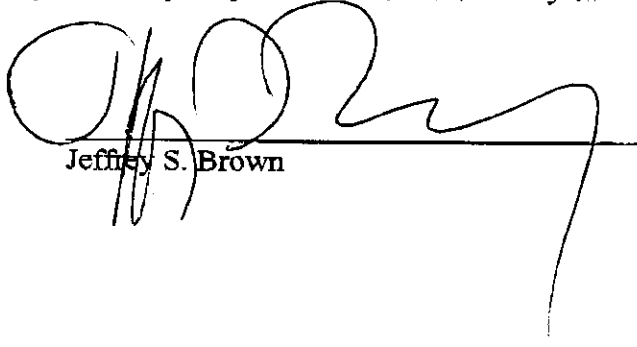
Signed under the pains and penalties of perjury this 5th day of April, 2006.



Jeffrey S. Brown

CERTIFICATE OF SERVICE

I, Jeffrey S. Brown, hereby swear and affirm that I served a copy of the foregoing motion on Assistant United States Attorney Paul Smyth by facsimile on this 5th day of April, 2006.



Jeffrey S. Brown